Statement of Basis

Tier I Operating Permit No. T1-2016.0021
Project ID 61701

TransCanada GTN System Samuels Station 4
Samuels, Idaho

Facility ID 017-00037

Final

June 19, 2017
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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu g/m^3$	micrograms per cubic meter
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmvd	parts per million by volume, dry
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO_2	sulfur dioxide

SO_x	sulfur oxides
TAP	toxic air pollutant
Tier I	Tier I operating permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

TransCanada GTN System Compressor Station No. 4 is a facility consisting of three turbines used to maintain flow of natural gas through the GTN pipeline system, and is located at 237 Samuels Road, Samuels, Idaho 83864. The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit oxides of nitrogen (NO_x) and carbon monoxide (CO) above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, TransCanada GTN System Compressor Station No. 4 is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from TransCanada GTN System Compressor Station No. 4 as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for TransCanada GTN System Compressor Station No. 4.

TransCanada GTN System Compressor Station No. 4 Tier I operating permit is organized into sections. They are as follows:

Section 1 – Acronyms, Units, and Chemical Nomenclature

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

Section 2 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 - Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements (MRRR) sufficient to assure compliance with each permit condition follows the permit condition.

Sections 4 through 6 - Three Natural Gas-Fired Turbines

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 7 – Emergency Generator Engine– 40 CFR 63 Subpart ZZZZ Requirements

NESHAP requirements for spark ignition reciprocating ignition combustion engine (RICE) applicable to the emergency generator.

Section 8 - Insignificant Activities

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b.

Section 9 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more

easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

TransCanada GTN System (TransCanada) operates a network of compressor stations that transmit natural gas from Canada to California along an underground pipeline. The pipeline enters the United States in northern Idaho, continues through southeastern Washington and central Oregon and enters California at its northern border. The network consists of 12 compressor stations located along the pipeline, all of which are designed for remote unattended operation from TransCanada's Gas Dispatch Center in Portland, Oregon. Each compressor station consists of one or more turbine-driven compressors that move natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors.

Compressor Station #4 in Samuels, Idaho uses three turbines to power the compressors. The turbines are referenced as Units 4A, 4B and 4C. Unit 4A is a Solar Titan 130S SoLoNO$_x$ turbine with a rated output capacity of 19,500 hp. Unit 4B is a Solar Mars 100S Low NO$_x$ turbine with a maximum rated output capacity of 15,000 hp. Finally, Unit 4C is a Solar Mars T14000 standard turbine with a maximum rated output capacity of 14,100 hp. All three turbines have their own stack.

3.2 Facility Permitting History

Tier I Operating Permit History – Previous 5-year permit term May 22, 2006 to May 22, 2011

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from March 7, 2011 to March 7, 2016. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

March 7, 2011	T1-2010.0100 , Tier 1 Renewal, Permit status (A, until T1-2016.0021 is issued, then superseded).

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

October 1, 1986	PTC # 0280-0007, Then known as Pacific Gas Transmission Company, was issued an initial PTC, Permit status (S)
December 22, 1989	PTC # 0280-0007, Permit modification, Permit status (S)
February 20, 1990	PTC # 0280-0007, Permit modification, Permit Status (S)
May 29, 1990	PTC # 0280-0007, Permit amended, Permit Status (S)
March 22, 1996	PTC # 017-00037, Permit modification to replace GE Frame 3 turbine and number changed, Permit Status (S)
November 21, 1996	PTC # 017-00037, Permit modification to increase emission rates to account for winter temperatures effects, Permit Status (S)
March 20, 1998	PTC # 017-00037, Permit modification to replace two gas-fired turbines with Unit 4B and 4C. There was an increase of 72 T/yr NOx. However, the increase was offset and PSD was not triggered. They also banked 73 T/yr NO$_x$ ERCs. The facility name was also changed to PG&E Gas Transmission Northwest, Permit Status (S).

October 22, 1999	PTC # 017-00037, Permit modification to increase facility-wide by 65 T/yr NOx. Because of the banked credits for the 1998 action PSD was not triggered. Permit Status (A).
August 1, 2001	Tier I operating Permit # 017-00037, Initial Title V permit for facility, Permit Status (S).
April 4, 2002	PTC # 017-00037, Initial permit for Unit 4A. PSD was triggered and a review occurred, Permit Status (S).
March 24, 2003	PTC # P-030100, Modification to Unit 4A. The emissions guarantee for NO_x changed from a percent of rated load to an air inlet temperature range while operating in $SoLoNO_x$ mode, Permit Status (S)
March 10, 2005	PTC # P-040117, Permit Revision to Unit 4A. Incorporate 40 CFR 60, Subpart GG and to update the responsible official. The facility name was changed to Gas Transmission Northwest Corp., Permit Status (S).
July 13, 2007	PTC # P-2007.0051, Permit modification to Unit 4A. Removal of visible emissions requirement to be present during a performance test for the $SoLoNO_x$ turbine, Permit Status (A).

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit T1-2010.0100. The Fuel-burning equipment requirements have been removed since the primary use of the turbines is compressing gasses. This primary use is not listed in the Fuel-burning equipment definition in IDAPA 58.01.01.006.45; therefore the related permit conditions have been removed as requested by the applicant. The format was changed slightly to follow DEQ template: document numbering has changed and typographical errors fixed. The new template has improved language for facilitywide fugitive dust monitoring as well.

4.2 Application Chronology

August 26, 2015	DEQ received an application.
October 25, 2015	DEQ determined that the application was complete, administratively.
August 2, 2016	DEQ made available the draft permit and statement of basis for peer and regional office review.
October 11, 2016	DEQ made available the draft permit and statement of basis for applicant review.
February 6, 2017	DEQ made available the draft permit and statement of basis for second applicant review.
March 21 – April 20, 2017	DEQ provided a public comment period on the proposed action.
April 26, 2017	DEQ provided the proposed permit and statement of basis for EPA review.
June 19, 2017	DEQ issued the final permit and statement of basis.

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Solar Mars 100S Low NOx Turbine

Table 5.1 lists the emissions units and control devices associated with the Solar Mars 100S Low NO_x Turbine.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
Unit 4B	Unit 4B-Solar Mars 100S Low NOx turbine 15,000 bhp Serial number: OHC13-M8038	None

The compressor station consists of three turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

5.2 Solar Mars T1400 Standard Turbine

Table 5.2 lists the emissions units and control devices associated with the Solar Mars T1400 Standard turbine.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
Unit 4C	Unit 4C-Solar Mars T1400 Standard turbine 14,100 bhp Serial number 0032M	None

The compressor station consists of three turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

5.3 Solar Titan 130S SoLoNox Turbine

Table 5.3 lists the emissions units and control devices associated with the Solar Titan 130S $SoLoNO_x$ Turbine.

Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)
Unit 4A	Unit 4A-Solar Titan 130S $SoLoNO_x^{TM}$ turbine 19,500 bhp Serial number OHH15-L0192	None

The compressor station consists of three turbine-driven compressors that move the natural gas through the pipeline. The turbines use the natural gas in the pipeline as fuel and provide energy for the compressors to induce the flow of the gas.

5.4 Process No. 4 – Emergency Spark Ignition Engine

Table 5.4 lists the emissions units and control devices associated with the emergency engine.

Table 5.4 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device Description (if applicable)
Make/model: Caterpillar 3516 Serial number: CAT00000JCSZ00259 Year manufactured: 2001	None

The emergency engine is used to provide backup electrical power in the event that power from the local utility company is interrupted. The engine uses natural gas from the pipeline as fuel.

5.5 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. Table 5.5 lists the IEU's identified in the permit application. Also summarized is the regulatory authority or justification for each IEU.

Table 5.5 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit/Activity	Regulatory Authority/Justification
Space Heating Boilers	58.01.01.317.01.b.i.(5)
Lubricating Oil System	58.01.01.317.07.a.i.(4)
Natural Gas Pipeline and Fuel System	58.01.01.317.01.b.i.(30)
Fugitive Emissions	58.01.01.317.01.b.i.(30)

5.6 Non-applicable Requirements for Which a Permit Shield is Requested

The facility has not requested a permit shield in accordance with IDAPA 58.01.01.325.01 (b) for non-applicable requirements.

5.7 Emissions Inventory

Table 5.6 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Table 5.6 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Emissions Unit Description	PM_{10}	NO_X	SO_2	CO	VOC	HAPs
Unit 4A	4.21	85.4	1.79	74.8	1.34	<10[(a)]
Unit 4B	4.1	73	1.6	51	1.8	1.13
Unit 4C	3.6	352	1.4	59.4	1.1	0.98
TOTAL EMISSIONS	**11.91**	**510.4**	**4.79**	**185.2**	**4.24**	**<12.11**

(a) as stated in Technical Memorandum (SOB) for T1-01700037 01/28/2000

The emissions associated with Unit 4A were established in the April 4, 2002 PTC issued to Pacific Gas and Electric Gas Transmission Northwest Corporation, later renamed to TransCanada. Although the current active PTC for Unit 4A was issued July, 13, 2007 no emissions changes have been made since 2002. Therefore, Appendix A of the Technical Memorandum from 2002 contains all the information in establishing the emissions. The appendix and the body of the memorandum contain PSD review when Unit 4A was added.

Information pertaining to emissions from Units 4B and 4C may be found in the October 22, 1999 Technical Memorandum. Also, the initial Tier I permit, issued April 1, 2001 provides further details.

Emissions have never been estimated for the emergency engine because it did not require a permit to construct.

The emissions of NO_x and CO exceed the Title V major source threshold, so a Tier I operating permit is

required. For Title V purposes, if any emissions exceed the Title V major threshold, then a permit is required, and it is unnecessary to assess other sources for PTE for Title V permitting purposes because a Title V permit is already required.

There is no change in emissions since the previous Tier I operating permit.

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Solar Mars 100S Low NOx Turbine Emissions Limits;
- Solar Mars T1400 Standard Turbine Emissions Limits;
- Solar Titan 130S SoLoNox Turbine Emissions Limits;
- Emergency Spark Ignition Engine Emissions Limits and
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling. In addition to the specific MRRR described under each permit condition, generally applicable facility-wide conditions and general provisions may also be required, such as monitoring, recordkeeping, performance testing, reporting, and certification requirements.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, a description of why and how the condition was changed is provided.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

6.1 Facility-Wide Conditions

Permit Condition 3.1 - Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 3.2 through 3.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 3.5 - Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 3.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

Permit Condition 3.7 - Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.8 & 3.9)

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test;
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permit Condition 3.10 & 3.11- Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

MRRR (Permit Conditions 3.12 through 3.14)

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory;
- Notify DEQ of each excess emissions event as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ;
- Maintain records of each excess emissions event.

Permit Condition 3.15 – Fuel-Burning Equipment PM Standards

The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.16 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.17 - Asbestos

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—"National Emission Standard for Asbestos."

[40 CFR 61, Subpart M]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.18 - Accidental Release Prevention

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance is present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.19 - Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.20 & 3.21 - NSPS/NESHAP General Provisions

This facility is subject to NSPS Subpart GG and NESHAP Subparts ZZZZ, and is therefore required to comply with applicable General Provisions.

[40 CFR 60/63, Subpart A]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.22 - Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 3.23 - Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does

not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Permit Condition 3.27 - Reports and Certifications

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.28 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.2 Emissions Unit-Specific Emissions Limits and MRR

Emission Unit No. 4 - Unit 4B Solar Mars 100S Low NO_x Turbine

Permit condition 4.1 removed

Requirements for Fuel-burning equipment have been removed at the request of the applicant.

Old Permit Condition 3.1 refering to IDAPA 58.01.01.676, 677 limitting PM grain loading has been removed. The Fuel-burning equipment requirements have been removed since the primary use of the turbines is compressing gasses. This primary use is not listed in the Fuel-burning equipment definition in IDAPA 58.01.01.006.45; therefore the related permit conditions have been removed as requested by the applicant.

Permit Condition 4.1

No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in the IDAPA 58.01.01.625.

[PTC. No. 017-00037, 10/22/1999]

MRRR (Permit Condition 3.8)

The permittee shall conduct a schedule, no less frequently than quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each

potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 4.2

NOx emissions from Unit 4B shall be *calculated using the NO_x ppmvd limit in accordance with 40 CFR 60.332(a) (2&3).*

[DRAFT][40 CFR 60.332(a) (2&3)]

MRRR

Calulculating the NO_x ppmvd using the original formulation was included for permit consistency with other compressor stations, and because it is the NSPS requirement.

The permittee shall demonstrate compliance with the NO_x emission limit using EPA Method 20 in accordance with 40 CFR 60.335.

Permit Condition 4.3

NO_x emissions from Unit 4B shall not exceed 73 tons per any consecutive 12-month period (T/yr). NO_x emissions shall be calculated in accordance with Condition 4.8.

[PTC. No. 017-00037, 10/22/1999]

MRRR (Permit Condition 4.8)

This permit condition was updated to the factor that has been applied later in the permit as part of the renewal process and gap-fill for NO_x tons per year calculation and monitoring:

The permittee shall monitor and record the average NO_x pound-per-hour (lb/hr) emissions rate at full-load operating conditions measured for each test in accordance with performance testing requirements of this permit. Compliance with the annual NO_x emissions rate limit shall be demonstrated as shown below.

$$(X_a \text{ lb/hr})(8{,}760 \text{ hr/yr})(1 \text{ T}/2000 \text{ lb}) = X \text{ T/yr}$$

Where: X_a = average pound-per-hour NO_x emissions rate at full-load operating conditions measured during testing.

Permit Condition 4.4 and 4.5

Unit 4B shall be fired by natural gas exclusively. The maximum amount of natural gas combusted in Unit 4B shall not exceed 1,110,000,000 standard cubic feet per any consecutive 12-month period (scf/yr).

[PTC. No. 017-00037, 10/22/1999]

MRRR (Permit Condition 4.7)

The permittee shall monitor and record the natural gas throughput to Unit 4B monthly and annually. Throughput shall be measured in cubic feet.

Permit Condition 4.6

No fuel containing sulfur in excess of 0.8% by weight shall be burned in Unit 4B.

[PTC. No. 017-00037, 10/22/1999]

MRRR (Permit Condition 4.9)

In accordance with 40 CFR 60.334(h)(3)(i), the permittee shall use the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less.

[40 CFR 60.334(h)(3)]

Permit condition 4.10

The permittee shall demonstrate compliance with the NO_x emission limit in Permit Conditions 4.2 and 4.3 using methods and procedures specified at 40 CFR 60.335.

[DRAFT] [IDAPA 58.01.01.200, 40 CFR 60.335]

MRRR

The requirement for multiple tests was removed because there is no reference to an annual average in the underlying permits. Other wording was changed for consistency with the language in the Tier 1 operating permits for the other compressor stations owned by Transcanada in this region.

New Permit condition 4.11, and 4.12

Clarification and interpretation determined new language for turbine replacements and parts in accordance with 40 CFR 52.21. Source testing for replacements was already in the permit as old Permit Condition 3.11.

[DRAFT] [IDAPA 58.01.01.200] [40 CFR 52.21]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

MRRR Permit condition 3.15 removed

Permit Condition 3.15 was removed as it was redundant with conditions 4.11 and 4.14. The permit condition contained a table of methods to be used for performance testing that was already stated in the performance testing permit condition. It was therefore unnecessarily complex and possibly unenforceable.

Emission Unit No. 2 - Unit 4C Solar Mars T14000 Standard Turbine

MRRR - permit Condition 5.1 removed

Requirements for Fuel-burning equipment have been removed at the request of the applicant.

Old Permit Condition 4.1 refering to IDAPA 58.01.01.676, 677 limitting PM grain loading has been removed. The Fuel-burning equipment requirements have been removed since the primary use of the turbines is compressing gasses. This primary use is not listed in the Fuel-bururning equipment definition in IDAPA 58.01.01.006.45; therefore the related permit conditions have been removed as requested by the applicant.

Permit Condition 5.1

No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in the IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho).

[IDAPA 58.01.01.625, 5/5/2000]

MRRRR (Permit Condition 3.8)

The permittee shall conduct a schedule, no less frequently than quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 5.2

NOx emissions from Unit 4C shall be *calculated using the NO_x ppmvd limit in accordance with 40 CFR 60.332(a) (2&3).*

[DRAFT][40 CFR 60.332(a) (2&3)]

MRRR

Calulculating the NO_x ppmvd using the original formulation was included for permit consistency with other compressor stations, and because it is the NSPS requirement.

The permittee shall demonstrate compliance with the NO_x emission limit using EPA Method 20 in accordance with 40 CFR 60.335.

Permit Condition 5.3

NO_x emissions from Unit 4C shall not exceed 352 tons per any consecutive 12-month period (T/yr). NO_x emissions shall be calculated in accordance with Permit Condition 5.7.

MRRRR

The permittee shall monitor and record the average NO_x pound-per-hour (lb/hr) emissions rate at full-load operating conditions measured for each test in accordance with performance testing requirements of this permit. Compliance with the annual NO_x emissions rate limit shall be demonstrated as shown below.

$$(X_a \text{ lb/hr})(8{,}760 \text{ hr/yr})(1 \text{ T}/2000 \text{ lb}) = X \text{ T/yr}$$

Where: X_a = average pound-per-hour NO_x emissions rate at full-load operating conditions measured during testing.

[IDAPA 58.01.01.322.01, 3/19/1999]

Permit Condition 5.4 and 5.5

Unit 4C shall be fired by natural gas exclusively.

The maximum amount of natural gas combusted in Unit 4C shall not exceed 963,600,000 standard cubic feet per any consecutive 12-month period (scf/yr).

[PTC No. 017-00037, 10/22/1999]

MRRRR (Permit Condition 5.8)

The permittee shall monitor and record the natural gas throughput to Unit 4C monthly and annually. Throughput shall be measured in cubic feet.

Permit Condition 5.7

No fuel containing sulfur in excess of 0.8% by weight shall be burned in Unit 4C.

[40 CFR 60.333(b); PTC No. 017-00037, 10/22/1999]

MRRRR (Permit Condition 5.9)

In accordance with 40 CFR 60.334(h)(3)(i), the permittee shall use the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less.

New Permit condition 5.10

The permittee shall demonstrate compliance with the NO_x emission limit in Permit Conditions 5.2 and 5.3 using methods and procedures specified at 40 CFR 60.335.

[DRAFT] [IDAPA 58.01.01.200, 40 CFR 60.335]

MRRR

The requirement for multiple tests was removed because there is no reference to an annual average in the underlying permits. Other wording was changed for consistency with the language in the Tier 1 operating permits for the other compressor stations owned by Transcanada in this region. This permit condition was added to this section for consistency with other NSPS regulated turbines.

New Permit condition 5.11, and 5.12

Clarification and interpretation determined new language for turbine replacements and parts in accordance with 40 CFR 52.21. Source testing for replacements was already in the permit as old Permit Condition 4.11

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

MRRR – Permit condition 4.15 removed

Permit Condition 5.15 was removed as it was redundant with conditions 5.11 and 5.14. The permit condition contained a table of methods to be used for performance testing that was already stated in the performance testing permit conditions. It was and was therefore unnecessarily complex and possibly unenforceable.

Emission Unit No. 3 - Unit 4A Solar Titan 130S SOLONO$_x$ ™ Turbine

Permit Condition 6.1 –

Particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM_{10}), sulfur dioxide (SO_2), NO_x, carbon monoxide (CO), and volatile organic compound (VOC) emissions from the Unit 4A stack shall not exceed any corresponding emissions rate limits listed in the following Table:

Table 6.3 UNIT 4A STACK EMISSIONS LIMITS

	Emissions Limits[a]									
	PM/ PM_{10}		SO_2		NO_X		VOC		CO	
Source	lb per MMscf[b]	T/yr[c]	lb per MMscf	T/yr	lb per MMscf	T/yr	lb per MMscf	T/yr	lb per MMscf	T/yr
$SoLoNO_x$™ gas turbine Unit 4A	6.73	4.21	2.86	1.79	164.4	85.4	2.14	1.34	119.6	74.8
Non-$SoLoNO_x$ mode	-	-	-	-	NA[d]		-	-	-	-
In $SoLoNO_x$ mode with ambient temperatures[e] less than 0°F	-	-	-	-	42.0 ppm[f]		-	-	-	-
In $SoLoNO_x$ mode with ambient temperatures[e] greater than or equal to 0°F	-	-	-	-	25.0 ppm[f]		-	-	-	-

[a] As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in this permit analysis.
[b] Pounds per million standard cubic feet
[c] Tons per year as determined by multiplying the actual or allowable (if actual is not available) lb/hr emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
[d] Unit 4A can only be operated in non-$SoLoNO_x$ mode during startup, shutdown, and load change.
[e] Ambient temperature is measured by a temperature probe at the air inlet for the gas turbine.
[f] Parts per million

[PTC No. P-2007.0051, 7/13/2007]

MRRR

Initial performance test and subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157.

MRRR

A compilation of the most recent five years of records shall be kept onsite, and shall be made available to DEQ representatives upon request. The permittee shall monitor and record the following information:

- The permittee shall monitor and record the throughput of natural gas combusted in Unit 4A and the range of gas generator speed (%NGG), including periods of startup, shutdown, and load change, on a consecutive 12-month period basis.
- The permittee shall demonstrate that the fuel combusted in the Unit 4A turbine engines meets the definition of natural gas in 40 CFR 60.331(u). The permittee shall use one of the following sources of information to make the required demonstration:
    - The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less; or
    - Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 60 of this chapter is required.

No monitoring of fuel nitrogen content is required so long as the permittee does not claim an allowance for fuel bound nitrogen as described in 40 CFR 60.332(a), and so long as natural gas is the fuel fired in the turbine engines.

MRRR (New permit condition 6.3)

This MRRR is added as gap fill for permit consistency with other compressor stations, and because it is the NSPS requirement.

Calulculating the NO_x ppmvd using the original formulation was included for permit consistency with other compressor stations, and because it is the NSPS requirement.

The permittee shall demonstrate compliance with the NO_x emission limit using EPA Method 20 in accordance with 40 CFR 60.335.

Permit Condition 6.2

Emissions from the Unit 4A gas turbine stack, any other stack, vent, or functionally equivalent opening associated with Unit 4A, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625, Rules for the Control of Air Pollution in Idaho. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[PTC No. P-2007.0051, 7/13/2007]

MRRRR (Permit Condition 3.8)

The permittee shall conduct a schedule, no less frequently than quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

or

b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 5.3 removed

Requirements for Fuel-burning equipment have been removed at the request of the applicant.

Old Permit Condition .1 refering to IDAPA 58.01.01.676, 677 limitting PM grain loading has been removed. The Fuel-burning equipment requirements have been removed since the primary use of the turbines is compressing gasses. This primary use is not listed in the Fuel-bururning equipment definition in IDAPA 58.01.01.006.45; therefore the related permit conditions have been removed as requested by the applicant.

Permit Condition 6.4

The Unit 4A gas turbine shall operate in non-SoLoNO$_x$ mode only during periods of startup, shutdown, and load change.

[PTC No. P-2007.0051, 7/13/2007]

MRRR

The permittee shall monitor and record the throughput of natural gas combusted in Unit 4A and the range of gas generator speed (%NGG), including periods of startup, shutdown, and load change, on a consecutive 12-month period basis.

Permit Condition 6.5

The maximum annual fuel throughput of the Unit 4A gas turbine shall not exceed 1,251,000,000 standard cubic feet per any consecutive 12-month period (scf/yr). Unit 4A shall be fired on natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/1999]

MRRR (Permit Condition 6.8)

The permittee shall monitor and record the throughput of natural gas combusted in Unit 4A and the range of gas generator speed (%NGG), including periods of startup, shutdown, and load change, on a consecutive 12-month period basis. The throughput of natural gas in standard cubic feet per hour (scf/hr) to Unit 4A shall be recorded during each performance test.

Permit Condition 6.6

No fuel containing sulfur in excess of 0.8% by weight shall be burned in the Unit 4A gas turbine.

[PTC No. P-2007.0051, 7/13/2007]

MRRR (Permit condition 6.8)

The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20 grains/100 scf or less; or

Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 60 of this chapter is required.

MRRR – Permit condition 6.9

Permit Condition 6.9 was added as gap fill for permit consistency with other compressors, compressor stations, and because it is the NSPS requirement.

The permittee shall demonstrate compliance with the NOx emission limit in Permit Conditions 6.1 and 6.3 using methods and procedures specified at 40 CFR 60.335.

- *Testing shall be performed during the first twelve months of the permit term and within 12 months of any changes to combustion related components including, but not limited to, the turbines compressor, combustion chamber, or turbine.*
- *Testing shall be performed at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine including the minimum point in the range and peak load or according to a DEQ approved alternative;*
- *During each test run, the permittee shall record the following information:*
  - *(a) NOx concentration, ppm by volume;*
  - *(b) Barometric pressure at test, mm Hg;*

(c) *Humidity of ambient air, g H2O/g air;*

(d) *Ambient temperature, K, and*

(e) *Fuel consumption, scf/hour*

New Permit condition 6.10, 6.11

Clarification and interpretation determined new language for turbine replacements and parts in accordance with 40 CFR 52.21.

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Emission Unit No. 4 - Emergency Generator – Permit Conditions 7.1 through 7.10

In accordance with 40 CFR 63.6603(a) emission limits or operating restrictions are required for the greater than 500 bhp stationary emergency RICE.

[40 CFR 63.6603(a)]

MRRR

In accordance with 63.6625(f), on and after October 19, 2013, an existing stationary emergency RICE located at an area source of HAP emissions must install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f)]

MRRR

In accordance with 40 CFR 63.6625(j), on and after October 19, 2013, the permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Emissions and Operating Limitations permit condition. The oil analysis must be performed at the same frequency specified for changing the oil.

[40 CFR 63.6625(j)]

MRRR

In accordance with 40 CFR 63.6655(e), the permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE.

[40 CFR 63.6655]

MRRR

In accordance with 40 CFR 63.6640(b) the permittee must report each instance in which the permittee did not meet each emission limitation or operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you. These instances are deviations from the emission and operating limitations in this subpart. These deviations must be reported according to the requirements in §63.6650.

[DRAFT][40 CFR 63.6640(b)]

In accordance with 40 CFR 63.6640(e), the permittee must also report each instance in which you did not meet the requirements in Table 8 to this subpart that apply to you.

[DRAFT][40 CFR 63.6640(e)]

MRRR

In accordance with 40 CFR 63.6650(f), each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in this subpart in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A).

MRRR

Any notifications or reporting required by the National Emission Standards for Hazardous Air Pollutants: Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart ZZZZ or Subpart A – General Provisions shall be submitted to the following address in accordance with 40 CFR 63.13:

Air Quality Permit Compliance

Coeur d'Alene Regional Office
Department of Environmental Quality
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

and

Part 70 Operating Permit Program
Air Operating Permits, OAW-150
1200 Sixth Ave., Suite 900
Seattle, WA 98101

[40 CFR 63.13]

6.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

Inspection and Entry

Upon presentation of credentials, the facility shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
    - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
    - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
    - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

- The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
- The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified;
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports

must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Bonner which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_2, SO_x, and Ozone. Reference 40 CFR 81.313.

7.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

This facility is major for NO_x and CO. Therefore, a Title V operating permit is required.

7.3 PSD Classification (40 CFR 52.21)

PSD is not applicable to this facility. When Unit 4A was added, the facility went through a PSD review. Details of this review can be found in the Statement of Basis of PTC 017-00037, issued April 4, 2002.

7.4 NSPS Applicability (40 CFR 60)

The facility has three natural-gas-fired turbines, all of which has been determined to be subject to this subpart.

40 CFR 60 Subpart GG

(a) The provisions of this subpart are applicable to the following affected facilities: All stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 million Btu) per hour, based on the lower heating value of the fuel fired.

This subpart is applicable to the facility because the facility has stationary gas turbines with a heat input at peak load greater than 10 MMBtu/hr.

(b) Any facility under paragraph (a) of this section which commences construction, modification, or reconstruction after October 3, 1977, is subject to the requirements of this part except as provided in paragraphs (e) and (j) of §60.332.

All three units have either been installed or replaced since October 3, 1977. Therefore all three turbines are subject to this subpart.

(e) Stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 million Btu/hour) but less than or equal to 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired and that have commenced construction prior to October 3, 1982 are exempt from paragraph (a) of this section.

§ 60.332 Standard for nitrogen oxides.

(a) On and after the date on which the performance test required by §60.8 is completed, every owner or operator subject to the provisions of this subpart as specified in paragraphs (b), (c), and (d) of this section shall comply with one of the following, except as provided in paragraphs (e), (f), (g), (h), (i), (j), (k), and (l) of this section.

(b) Electric utility stationary gas turbines with a heat input at peak load greater than 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired shall comply with the provisions of paragraph (a)(1) of this section.

(c) Stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 million Btu/hour) but less than or equal to 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired, shall comply with the provisions of paragraph (a)(2) of this section.

(d) Stationary gas turbines with a manufacturer's rated base load at ISO conditions of 30 megawatts or less except as provided in §60.332(b) shall comply with paragraph (a)(2) of this section.

60.332(c) applies because the turbine has a heat input between 10 and 100 MMBtu/hr.

The facility must comply with (a)(2):

(2) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of:

$$STD = 0.0150\frac{(14.4)}{Y} + F$$

where:

STD = allowable ISO corrected (if required as given in §60.335(b)(1)) NO_X emission concentration (percent by volume at 15 percent oxygen and on a dry basis),

Y = manufacturer's rated heat rate at manufacturer's rated peak load (kilojoules per watt hour), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The value of Y shall not exceed 14.4 kilojoules per watt hour, and

F = NO_X emission allowance for fuel-bound nitrogen as defined in paragraph (a)(4) of this section.

(3) The use of F in paragraphs (a)(1) and (2) of this section is optional. That is, the owner or operator may choose to apply a NO_X allowance for fuel-bound nitrogen and determine the appropriate F-value in accordance with paragraph (a)(4) of this section or may accept an F-value of zero.

(4) If the owner or operator elects to apply a NO_X emission allowance for fuel-bound nitrogen, F shall be defined according to the nitrogen content of the fuel during the most recent performance test required under §60.8 as follows:

Fuel-bound nitrogen (percent by weight)	***F (NO_X percent by volume)***
$N \leq .015$	*0*
$0.015 < N \leq 0.1$	*0.04 (N)*
$0.1 < N \leq 0.25$	*$0.004+0.0067(N–0.1)$*
$N > 0.25$	*0.005*

Where:

N = the nitrogen content of the fuel (percent by weight).

or:

Manufacturers may develop and submit to EPA custom fuel-bound nitrogen allowances for each gas turbine model they manufacture. These fuel-bound nitrogen allowances shall be substantiated with data and must be approved for use by the Administrator before the initial performance test required by §60.8. Notices of approval of custom fuel-bound nitrogen allowances will be published in the Federal Register.

A previous permit analysis determined this limit to be 42 ppm, and a permit condition was written for this limit for all three turbines

60.332 (e) Stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10 million Btu/hour) but less than or equal to 107.2 gigajoules per hour (100 million Btu/hour) based on the lower heating value of the fuel fired and that have commenced construction prior to October 3, 1982 are exempt from paragraph (a) of this section.

§ 60.333 Standard for sulfur dioxide.

On and after the date on which the performance test required to be conducted by §60.8 is completed, every owner or operator subject to the provision of this subpart shall comply with one or the other of the following conditions:

(a) No owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.

(b) No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw).

The facility may choose either option and has chosen 60.333(b). This requirement was written into a permit condition.

§ 60.334(h) The owner or operator of any stationary gas turbine subject to the provisions of this subpart:

(1) Shall monitor the total sulfur content of the fuel being fired in the turbine, except as provided in paragraph (h)(3) of this section.

(3) Notwithstanding the provisions of paragraph (h)(1) of this section, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the

maximum total sulfur content of the fuel is 20.0 grains/100 scf or less, regardless of whether an existing custom schedule approved by the administrator for subpart GG requires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration:

(i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less;

The facility has requested option (h)(3)(i) for sulfur monitoring. This is a new option from the most recent rule revision.

The following permit condition has been written:

In accordance with 40 CFR 60.334(h)(3)(i), the permittee shall use the gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less).

This demonstrates that the fuel meets the definition of natural gas in §60.331(u), which is defined as follows:

(u) Natural gas means a naturally occurring fluid mixture of hydrocarbons (e.g. , methane, ethane, or propane) produced in geological formations beneath the Earth's surface that maintains a gaseous state at standard atmospheric temperature and pressure under ordinary conditions. Natural gas contains 20.0 grains or less of total sulfur per 100 standard cubic feet. Equivalents of this in other units are as follows: 0.068 weight percent total sulfur, 680 parts per million by weight (ppmw) total sulfur, and 338 parts per million by volume (ppmv) at 20 degrees Celsius total sulfur. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 British thermal units (Btu) per standard cubic foot. Natural gas does not include the following gaseous fuels: landfill gas, digester gas, refinery gas, sour gas, blast furnace gas, coal-derived gas, producer gas, coke oven gas, or any gaseous fuel produced in a process which might result in highly variable sulfur content or heating value.

Based on this definition, if the tariff sheet shows that the maximum sulfur content of the fuel is 20.0 gr/100 scf, then the weight percent of sulfur is 0.068 percent (or less), which is less than the limit of 0.8% by weight as specified in the rule and in the permit. Therefore, if the gas quality characteristics show a maximum total sulfur content of 20.0 gr/100 scf or less, compliance with the limit of 0.8% by weight has been demonstrated.

The test methods and procedures have been incorporated in a previous permit analysis.

7.5 NESHAP Applicability (40 CFR 61)

The NESHAP provisions do not apply to this facility.

7.6 MACT Applicability (40 CFR 63)

40 CFR 63 Subpart ZZZZ.....NESHAPS for Stationary Reciprocating Internal Combustion Engines is applicable to the emergency generator engine.

§ 63.6585 Am I subject to this subpart?

You are subject to this Subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

(a) A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

(c) An area source of HAP emissions is a source that is not a major source.

TransCanada does operate a Caterpillar 3516 emergency engine manufactured in 2001 periodically throughout the year and it is used in emergency situations only. In addition, the facility is an area source for HAPs as they are below the major source thresholds of 10 T/yr for any one federally regulated HAP and 25 T/yr for all HAPs combined. This is assured by Permit Condition 2.1 within the associated permit.

§ 63.6590 What parts of my plant does this subpart cover?

This subpart applies to each affected source.

(a) Affected source. An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.

(1) Existing stationary RICE.

(iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

The engine located at TransCanada is considered existing as it was constructed prior to December 19, 2002.

§ 63.6595 When do I have to comply with the subpart?

(a)(1) If you have an existing stationary RICE, excluding existing non-emergency CI stationary RICE, with a site rating of more than 500 brake HP located at a major source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than June 15, 2007. If you have an existing non-emergency CI stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, an existing stationary CI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, or an existing stationary CI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. If you have an existing stationary SI RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, ***or an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013****.*

The applicable IC engine must be in compliance with the Subpart no later than October 19, 2013.

§ 63.6600 What emission limitations and operating limitations must I meet if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

The applicable IC engine is not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6601 What emission limitations must I meet if I own or operate a 4SLB stationary RICE with a site rating of greater than or equal to 250 brake HP and less than 500 brake HP located at a major source of HAP emissions?

The applicable IC engine is not operating at a major source for HAP emissions and the engine is not a 4-stroke lean burn spark ignition between 250 and 500 bhp. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6602 What emission limitations must I meet if I own or operate an existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions?

The applicable IC engine is not operating at a major source for HAP emissions. Therefore there are no applicable emission and operating limitations under this section.

§ 63.6603 What emission limitations and operating limitations must I meet if I own or operate an existing stationary RICE located at an area source of HAP emissions?

Compliance with the numerical emission limitations established in this Subpart is based on the results of testing the average of three 1-hour runs using the testing requirements and procedures in §63.6620 and Table 4 to this Subpart.

(a) If you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d to this Subpart and the operating limitations in Table 2b to this Subpart which apply to you.

Table 2b does not apply as it refers only to CI non-emergency engines greater than 500 bhp at area source facilities. Table 2d, however, identifies those limitations required by area sources to comply with the Subpart. The specifics of Table 2d require that the permittee perform regular maintenance on the applicable engine such as changing oil and filters every 500 operating hours, inspect spark plugs every 1,000 hours of operation and inspect all hoses and belts every 500 hours of operation. Each of the maintenance procedures shall occur at the indicated interval or annually, whichever occurs first.

§ 63.6604 What fuel requirements must I meet if I own or operate an existing stationary CI RICE?

If you own or operate an existing non-emergency, non-black start CI stationary RICE with a site rating of more than 300 brake HP with a displacement of less than 30 liters per cylinder that uses diesel fuel, you must use diesel fuel that meets the requirements in 40 CFR 80.510(b) for nonroad diesel fuel. Existing non-emergency CI stationary RICE located in Guam, American Samoa, the Commonwealth of the Northern Mariana Islands, or at area sources in areas of Alaska not accessible by the FAHS are exempt from the requirements of this section.

TransCanada operates an emergency engine and it is not CI; therefore this section does not apply to the facility.

§ 63.6605 What are my general requirements for complying with this Subpart?

(a) You must be in compliance with the emission limitations and operating limitations in this Subpart that apply to you at all times.

(b) At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

When operating the applicable IC engine, they be operated in a manner that is consistent with reducing emissions and compliance with appropriate limitations applies at all times.

§ 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions?

The engine located at TransCanada is not required to perform any performance tests and the applicable IC engine is not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

§ 63.6611 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate a new or reconstructed 4SLB SI stationary RICE with a site rating of greater than or equal to 250 and less than or equal to 500 brake HP located at a major source of HAP emissions?

The engine located at TransCanada is not required to perform any performance tests and the applicable IC engine is not operating at a major source for HAP emissions. No testing is required in accordance with Table 2d of the subpart.

§ 63.6612 By what date must I conduct the initial performance tests or other initial compliance demonstrations if I own or operate an existing stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing stationary RICE located at an area source of HAP emissions?

The engine located at TransCanada is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6615 When must I conduct subsequent performance tests?

The engine located at TransCanada is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6620 What performance tests and other procedures must I use?

The engine located at TransCanada is not required to perform any performance tests. No testing is required in accordance with Table 2d of the subpart.

§ 63.6625 What are my monitoring, installation, collection, operation, and maintenance requirements?

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions:

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;

The applicable IC engine needs to be operated in accordance with manufacturer's specifications or a maintenance plan may be developed that is consistent with good air pollution control practices.

(f) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions or an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed.

A non-resettable meter shall be installed if not previously installed.

(h) If you operate a new, reconstructed, or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Tables 1a, 2a, 2c, and 2d to this subpart apply.

Idle startup time may not exceed 30 minutes. Applicable emissions standards must be met following the allowable 30 minutes.

(j)If you own or operate a stationary SI engine that is subject to the work, operation or management practices in items 6, 7, or 8 of Table 2c to this subpart or in items 5, 6, 7, 9, or 11 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the

analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

This section allows TransCanada to develop their own oil analysis program to modify the oil changing frequency if the program meets all criteria set forth in subsection j of the subpart. Permit Condition 6.7 accounts for these.

§ 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?

The applicable IC engine is designated as emergency, and it does not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. Therefore, this section is not applicable.

§ 63.6635 How do I monitor and collect data to demonstrate continuous compliance?

The applicable IC engine is designated as emergency, and it does not have any emission or operating limitations. Rather, maintenance requirements are specified in Table 2d of this subpart. As a result data capture is not necessary. Therefore, this section is not applicable.

§ 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?

(a) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 1a and 1b, Tables 2a and 2b, Table 2c, and Table 2d to this subpart that apply to you according to methods specified in Table 6 to this subpart.

Section 9 of Table 6 of the subpart pertains to the emergency IC engine at TransCanada. Requirement work practices are accounted for within Permit Condition 6.4 of the associated permit.

(f) Requirements for emergency stationary RICE. (1) If you own or operate an existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a new or reconstructed emergency stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions that was installed on or after June 12, 2006, or an existing emergency stationary RICE located at an area source of HAP emissions, you must operate the emergency stationary RICE according to the requirements in paragraphs (f)(1)(i) through (iii) of this section. Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in paragraphs (f)(1)(i) through (iii) of this section, is prohibited. If you do not operate the engine according to the requirements in paragraphs (f)(1)(i) through (iii) of this section, the engine will not be considered an emergency engine under this subpart and will need to meet all requirements for non-emergency engines.

(i) There is no time limit on the use of emergency stationary RICE in emergency situations.

(ii) You may operate your emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.

(iii) You may operate your emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low

frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph (f)(1)(iii), as long as the power provided by the financial arrangement is limited to emergency power.

The above requirements pertain specifically to emergency engines. Permit Condition 6.8 accounts for these.

§ 63.6645 What notifications must I submit and when?

(a) You must submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply to you by the dates specified if you own or operate any of the following;

(5) This requirement does not apply if you own or operate an existing stationary RICE less than 100 HP, an existing stationary emergency RICE, or an existing stationary RICE that is not subject to any numerical emission standards.

This section of the subpart is not applicable to the engine at TransCanada because it is designated as emergency. 63.6645(a)(5) explicitly exempts emergency engines from this requirement.

§ 63.6650 What reports must I submit and when?

(a) You must submit each report in Table 7 of this subpart that applies to you.

All required reporting is specified in Table 7. However, Table 7 does not include any requirements for emergency engines. Therefore, this section of the subpart is not applicable to TransCanada Lumber.

§ 63.6655 What records must I keep?

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(2) An existing stationary emergency RICE.

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) or (2) of this section, you must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the owner or operator must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

TransCanada needs to maintain records demonstrating that the engine is being operated in accordance an appropriate maintenance plan. Records of operational hours from the non-resettable meter must also be kept. How many hours were spent in emergency situations and demand response. These requirements are established in condition 6.9.

§ 63.6660 In what form and how long must I keep my records?

(a) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1).

(b) As specified in §63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

(c) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1)

These requirements are established in condition 7.9.

These requirements are included in the permit.

40 CFR 63 Subpart JJJJJJ NESHAPS for area source boilers

§63.11195 Are any boilers not subject to this subpart?

The types of boilers listed in paragraphs (a) through (k) of this section are not subject to this subpart and to any requirements in this subpart.

(e) A gas-fired boiler as defined in this subpart.

40 CFR 63.1195(e) specifies that gas fired boilers are not subject to this subpart. The boilers at this facility combust natural gas exclusively therefore this subpart does not apply to the facility.

7.7 CAM Applicability (40 CFR 64)

There is no pollution control equipment to make this rule applicable to this facility. Emissions are controlled by dry low-NOx combustion, achieved by reducing peak flame temperature and employing lean pre-mixed combustion. However, "control device" in the rule refers to literal control equipment, so compliance assurance monitoring does not apply to this facility.

7.8 Acid Rain Permit (40 CFR 72-75)

The acid rain provisions do not apply to this facility.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from **DATE to DATE**. During this time, comments **WERE / WERE NOT** submitted in response to DEQ's proposed action. ***{If comments were received, include the following text.}*** A response to public comments document has been crafted by DEQ based on comments submitted during the public comment period. That document is part of the final permit package for this permitting action.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on **DATE** via e-mail. On **DATE**, EPA Region 10 responded to DEQ via e-mail indicating **EPA RESPONSE**.

Appendix A - Facility Comments for Draft Permit

Permit Cover Page: Are facility contacts and ROs not included anymore? We have a new RO from what was listed in this permit…

> **DEQ Response:** Facility contacts are stored in Idaho DEQ AIMs database, not in the permit. The permit coverletter will go to your current responsible official, but only the physical location of the station is on the permit.

Permit Condition 4.3, 5.3, and 6.3: What are the units of measure? Is this calculated after a stack test?

> **DEQ Response:** This is the NO_x volume divided by the total volume, multiplied by 100, so there are no units. It can be converted to ppmvd by moving the decimal.

Permit Condition 4.1, 5.1, and 6.10: Do you mean a gas generator change out?

> **DEQ Response:** This is referring to replacing parts on the turbine. The descriptive clause "including, but not limited to engine jet, turbine fan, and compressor" has been added to clarify.